

Formosa Plastics Corporation, Texas

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July 31, 2019

Certified Mail: 7018 2290 0000 0529 7446

Air Section Manager, Region 14 Texas Commission Environmental Quality Natural Resource Center 6300 Ocean Drive, Suite 1200 Corpus Christi, Texas 78412

RE: Formosa Plastics Corporation, Texas

TCEQ Air Quality Account No. CB-0038-Q

Second Quarter 2019 North SUMMA Canister Report

Dear Air Section Manager:

Please find attached the quarterly summary of results from the North SUMMA Canister Monitoring System. This system, and the associated FTIR, was installed as a Supplemental Environmental Project (SEP) as required by TCEQ Docket No. 2000-1144-AIR-E. The sampling requirements of the SEP have been met by FPC-TX, and sampling has been reduced to a monthly frequency. The second quarter 2019 results are shown on the attached table. Additionally, we have included wind roses generated by the weather sensor on the North FTIR or wind direction data from other air monitoring devices for each SUMMA canister sampling date during the second quarter 2019.

This report was designed to be similar to the Point Comfort SUMMA Canister Monitoring Report to maintain reporting consistency. Additionally, an electronic copy of the report has been sent to Dr. Tracie Phillips, per Mr. Darrell McCant's request.

Should you have any questions please contact Vanessa Peppers by e-mail at VanessaP@ftpc.fpcusa.com.

Sincerely,

Rick Crabtree

Vice President/General Manager Formosa Plastics Corporation, Texas

Attachments





Certified Mail: 7018 2290 0000 0529 7453

cc: Dr. Tracie Phillips

Toxicology Division

Texas Commission on Environmental Quality

P. O. Box 13087

Austin, Texas 78711-3087

FORMOSA PLASTICS CORPORATION, TEXAS

SUMMA CANISTER QUARTERLY REPORT

CALCULATION METHODOLOGY

Following is the calculation methodologies used to calculate the Year-To-Date Sum and Year-To-Date Average for the North SUMMA canister sampling site. Please note, there are two columns associated with each component analyzed. The column titled "Actual" represents the results reported by the independent laboratory contracted to analyze the SUMMA canisters. The column titled "½ Reported LOD (Limit of Detection)" represents either the actual result or one-half the limit of detection reported by the laboratory, as appropriate.

ACTUAL

The following is entered into the column titled "Actual":

Numerical Value - Actual results reported by the independent laboratory when the result is equal to or greater than the limit of detection. The

numerical value is used to calculate the year-to-date sum and the

year-to date average;

ND (Non Detect) - As reported by the laboratory. The value of "0" is used to calculate

the year to date sum and the year-to-date average;

BDL (Below Detection Limit) - Entered when the actual result is less than the reported limit of detection. The value of "0" is used to calculate the year-to-

date sum and the year-to-date average;

"*" - Non operational sampling period.

1/2 REPORTED LOD (LIMIT OF DETECTION)

The following is entered into the column titled "1/2 Reported LOD":

Numerical Value - Actual results reported by the independent laboratory when the

result is equal to or greater than the limit of detection. The numerical value is used to calculate the year-to-date sum and the

year-to-date average;

½ the Reported Limit of Detection - ½ the reported limit of detection when the results are reported as non-detect and when the actual result is below the

detection limit (BDL). ½ the reported limit of detection is used to

calculate the year-to-date sum and the year-to-date average.

"*" - Non operational sampling period.

FORMOSA PLASTICS CORPORATION, TEXAS

SUMMA CANISTER QUARTERLY REPORT

Limit of Detection (LOD) - Method Detection Limit, Limit of Detection, Reporting Limit, etc... as reported by the independent laboratory conducting the analysis.

DUPLICATE SAMPLES

The duplicate samples are reported discreetly on a separate VOC Canister Analysis Table. This is done so that the duplicate samples can be compared to the routine samples and the Relative Percent Difference (RPD) can be calculated. The RPD is calculated using the following equation:

$$\{(X1-X2) / [(X1+X2) / 2]\} \times 100$$

Where the duplicate and routine sample indicated "ND", the RPD is reported as "ND". Where the duplicate or routine sample indicated "ND" and the other indicated a concentration greater than ND, the RPD is calculated by using the value entered in the actual concentration column and the value entered in the ½ Reported LOD column.

YEAR-TO-DATE SUM

The year-to-date sum is calculated by taking the sum of all values entered in the column.

YEAR-TO-DATE AVERAGE

The following formula is used to calculate the year-to-date average:

Year-To-Date Sum / (Number of theoretical sample periods - Number of non operational sample periods)

FORMOSA VOC CANISTER ANALYSIS 2nd QUARTER 2019 NORTH SITE

MEVIND Avci, MIND Avci, MIND Actual LOD Actual Actual LOD Actual	SAMPLE DATE	AVG.WIND		ETHY	ETHYLENE	1,3 BUT	1,3 BUTADIENE	BENZ	BENZENE	VINYL CI	VINYL CHLORIDE	ETHYLENE	ETHYLENE DICHLORIDE
Obegrees) SPEED (mph) (pph)		DIRECTION	AVG. WIND	Actual	1/2 Reported LOD	Actual	1/2 Reported LOD	Actual	1/2 Reported LOD	Actual	1/2 Reported	Actual	1/2 Reported
322 8.9 * <th></th> <th>(Degrees)</th> <th>SPEED (mph)</th> <th>(qdd)</th> <th>(qdd)</th> <th>(qdd)</th> <th>(qdd)</th> <th>(qdd)</th> <th>(qdd)</th> <th>(qdd)</th> <th>(qdd)</th> <th>(qaa)</th> <th>(qaa)</th>		(Degrees)	SPEED (mph)	(qdd)	(qdd)	(qdd)	(qdd)	(qdd)	(qdd)	(qdd)	(qdd)	(qaa)	(qaa)
158 14.5 ND 0.0500 ND 0.1250 0.1360 0.04360 0.04360 0.01630 0.1630 0.1630 0.1630 0.1630 0.1630 0.1630 0.1630 0.1630 0.1630 0.1630 0.1630 0.1630 0.1630 0.1630 ND 0.0500 ND 0.1250 ND 0.0500 ND 0.0500 ND 0.0500 ND 0.1250 0.2980 0.2980 ND 0.0500 ND 0.0500 ND 0.1250 0.23410 ND 0.0500 ND	07/28/18	322	6.8	*	*	*	*	*	*	*	*	*	*
160 13.9 ND 0.0500 ND 0.1250 ND 0.0500 ND 0.0500 4 196.4 ND 0.0500 ND 0.1250 ND 0.0500 ND 0.0500 152 94 * * * * * * * 115 1.5 3.3 ND 0.0500 ND 0.1250 0.2980 0.2980 ND 0.0500 26 8.9 ND 0.0500 ND 0.1250 0.2130 ND 0.0500 ND 137 12.0 * * * * * * * 146 17.0 2.1700 ND 0.0329 0.2580 0.2090 0.0994 0.0994 133 9.7 2.1400 2.1800 0.1510 0.1510 0.6520 0.05994 0.0994 0.0994	08/31/18	158	14.5	ND	0.0500	QN.	0.1250	0.4360	0.4360	0.1630	0.1630	03360	03360
4 196.4 ND 0.0500 ND 0.1250 ND 0.0500 ND 0.0500 2 94 * * * * * * * * * 152 3.3 ND 0.0500 ND 0.1250 0.2980 0.2980 ND 0.0500 ND 0.0550 ND 0.0500 ND 0.0500 ND 0.0550 ND 0.0500 0.0500 ND 0.0500	09/30/18	160	13.9	ND	0.0500	QN	0.1250	N ON	0.0500	QX	0.0500	ON	0.0500
2 94 *	10/28/18	4	196.4	ND	0.0500	ND	0.1250	ND	0.0500	ND	0.0500	QX	0.0500
152 3.3 ND 0.0500 ND 0.1250 0.2980 0.2980 ND 0.0500 114 7.3 ND 0.0500 ND 0.1250 0.3410 ND 0.0500 26 8.9 ND 0.0500 ND 0.1250 0.2130 ND 0.0500 137 12.0 * * * * * * 146 17.0 2.1700 2.1700 0.1250 0.0329 0.2580 0.2580 0.2090 0.2090 133 9.7 2.1400 2.1400 0.1510 0.1550 0.0333 0.0394 0.0994 0.0994 165 4.1 2.0800 2.0800 0.1510 0.1510 0.6550 0.0550 ND 0.0383	11/27/18	2	94	*	*	*	*	*	*	*	*	*	*
114 7.3 ND 0.0500 ND 0.1250 0.3410 0.3410 ND 0.0500 26 8.9 ND 0.0500 ND 0.1250 0.2130 ND 0.0500 137 12.0 * * * * * * * 146 17.0 2.1700 2.1700 ND 0.0329 0.2580 0.2580 0.2090 0.2090 0.2090 133 9.7 2.1400 2.1400 0.150 0.1550 0.3330 0.0394 0.0994 0.0994 165 4.1 2.0800 2.0800 0.1510 0.1510 0.6550 ND 0.0383	12/27/18	152	3.3	ND	0.0500	QN	0.1250	0.2980	0.2980	QN	0.0500	0.1320	0.1320
26 8.9 ND 0.0500 ND 0.1250 0.2130 0.2130 ND 0.0500 137 12.0 * * * * * * * * 146 17.0 2.1700 2.1700 ND 0.0329 0.2580 0.2580 0.2090 0.2090 0.2090 133 9.7 2.1400 2.1400 0.1570 0.1550 0.3330 0.0330 0.0994 0.0994 165 4.1 2.0800 2.0800 0.1510 0.1510 0.6250 0.6250 ND 0.0383	01/16/19	114	7.3	ND	0.0500	QN	0.1250	0.3410	0.3410	QN	0.0500	GN	0.0500
137 12.0 * <td>02/21/19</td> <td>26</td> <td>8.9</td> <td>ND</td> <td>0.0500</td> <td>ND</td> <td>0.1250</td> <td>0.2130</td> <td>0.2130</td> <td>N</td> <td>0.0500</td> <td>QN</td> <td>0.0500</td>	02/21/19	26	8.9	ND	0.0500	ND	0.1250	0.2130	0.2130	N	0.0500	QN	0.0500
146 17.0 2.1700 2.1700 ND 0.0329 0.2580 0.2580 0.2090 0.2090 0.2090 133 9.7 2.1400 2.1400 0.1250 0.1250 0.3330 0.3330 0.0994 0.0994 165 4.1 2.0800 2.0800 0.1510 0.1510 0.6250 0.6250 ND 0.0383	03/23/19	137	12.0	*	*	*	*	*	*	*	*	*	*
133 9.7 2.1400 2.1400 0.1250 0.1250 0.1250 0.3330 0.3330 0.0994 0.0994 165 4.1 2.0800 2.0800 0.1510 0.1510 0.6250 0.6250 ND 0.0383	04/30/19	146	17.0	2.1700	2.1700	Q.	0.0329	0.2580	0.2580	0.2090	0.2090	ON	0.0329
165 4.1 2.0800 2.0800 0.1510 0.1510 0.6250 0.6250 ND 0.0383	05/30/19	133	6.7	2.1400	2.1400	0.1250	0.1250	0.3330	0.3330	0.0994	0.0994		0.0389
	06/29/19	165	4.1	2.0800	2.0800	0.1510	0.1510	0.6250	0.6250	QN.	0.0383	2	0.0383

	ETH	ETHYLENE	1,3 BUT	1,3 BUTADIENE	BEN	BENZENE	VINYL C	VINYL CHLORIDE	ETHYLENE	ETHYLENE DICHLORIDE
	Actual	1/2 Reported LOD	Actual	1/2 Reported LOD	Actual	1/2 Reported LOD	Actual	1/2 Reported LOD	Actual	1/2 Reported LOD
	(qdd)	(pdd)	(qdd)	(qdd)	(qdd)	(qdd)	(qdd)	(qdd)	(qdd)	(qaa)
Year-To-Date Sum	6.3900	0069'9	0.2760	1 0589	2 5040	2 6040	0.471.4	70570	0.4690	00220
		I		20000	2:20:2	2:00-0	0.4714	0.1331	0.4000	0.7780
Rolling Year Average	0.7100	0.7433	0.0307	0.1177	0.2782	0.2893	0.0524	0.0844	0.0500	0.0864
									0.000	0.0004
Annual Average	1.2780	1.2980	0.0552	0.1118	0.3540	0.3540	0.0617	0.0893	0.000	0.0420
									00000	0.0

12 Number of non operational sample periods Number of theoretical sample periods

12 12

12

12

12

12

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12

d - Duplicate sample taken in addition to the routine sample (See Calculation Methodology for information on inclusion of duplicate sample results.)

* - non operational, data from the North site was used for Wind Direction and Wind Speed, if available

a - Wind rose attached

	b) Inv	Li		
TCEQ Air Monitoring	Values (ppl	LT	0.47	0.72
TCEQ Air	Comparison Values (ppb)	\mathbf{ST}	27,000	94
		Chemical	Vinyl Chloride	Sthylene Dichloride

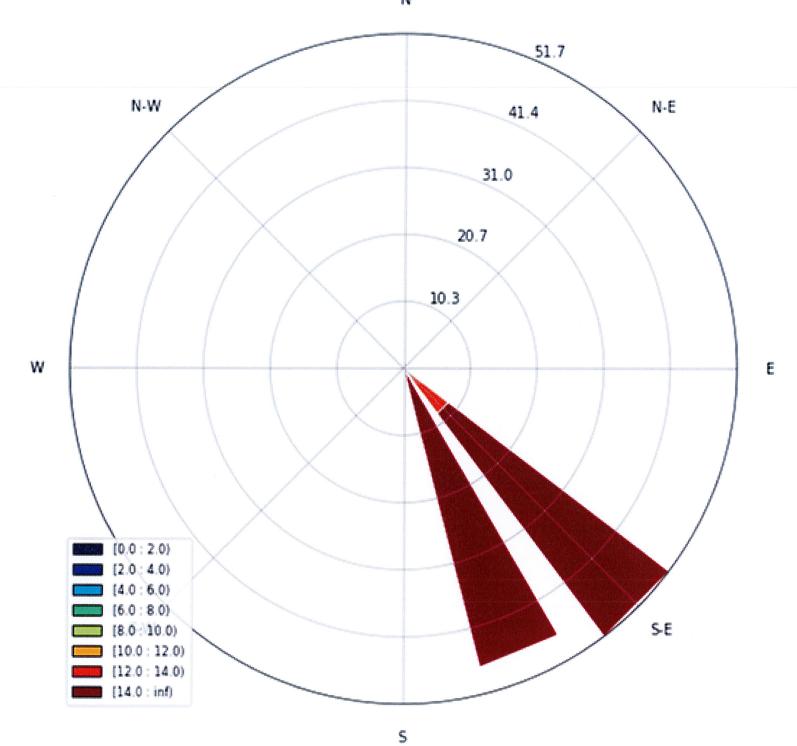
	TCEQ Air	TCEQ Air Monitoring	
	Comparison	Comparison Values (ppb)	Investigation
Chemical	\mathbf{ST}	LT	Limit (ppb)
Vinyl Chloride	27,000	0.47	25
Ethylene Dichloride	94	0.72	29.7
Benzene	180	1.4	28.2
Ethylene	500,000	30	500
1, 3 Butadiene	1,700	6	25

Summary of Non-operational Periods - 2nd Quarter 2019

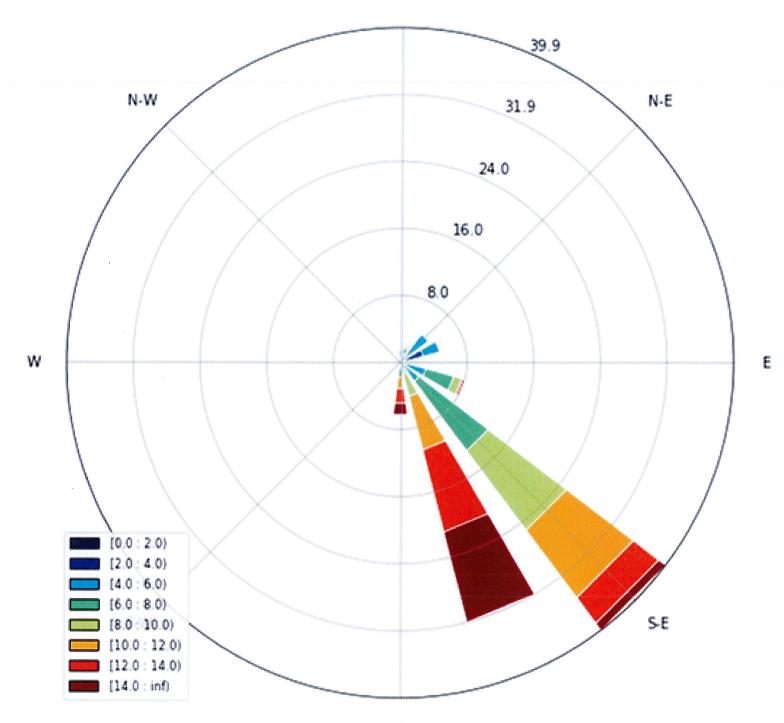
North Site SUMMA Canister System

SUMMA Site Date (s) Description of Problem Corrective Action No downtime during second quarter 2019. Action

FN: April 30 2019



FN: May 30 2019



FN: June 29 2019

